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5 **IN THE UNITED STATES DISTRICT COURT**
6 **FOR THE WESTERN DISTRICT OF WASHINGTON**

7 BRENDA AND DAVE DINGER,

8 Plaintiffs,

9 v.

10 COLUMBIA DEBT RECOVERY, LLC,

11 Defendants.
12

Case No.:

**DEFENDANT COLUMBIA DEBT
RECOVERY, LLC'S NOTICE OF
REMOVAL**

King County Superior Court
Case No. [N/A]

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14 TO THE CLERK OF THE COURT:

15 PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. §§ 1331, 1367, 1441, and 1446, and
16 LCR 101, Defendant Columbia Debt Recovery, LLC ("CDR" or "Defendant"), hereby removes
17 the above-captioned action from the Washington State Superior Court for King County to the
18 United States District Court for the Western District of Washington. The bases for removal are
19 federal question jurisdiction pursuant to 28 U.S.C. § 1331 and supplemental jurisdiction pursuant
20 to 28 U.S.C. § 1367(a). In support of the Notice of Removal, the Defendant states as follows:
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22 1. Plaintiffs Brenda and Dave Dinger served CDR with a Summons and Complaint for
23 an action to be filed in King County Superior Court for the State of Washington on or about May
24 20, 2025. A true and correct copy of the Summons and Complaint along with any attachments
25 thereto are attached hereto, incorporated herein, and marked Exhibit A.
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2. This removal is timely under 28 U.S.C. § 1446(b) as Defendant was served with Plaintiff's Summons and Complaint on or about May 20, 2025.

3. Pursuant to 28 U.S.C. § 1446 and LCR 101(c) Exhibit A contains all records, proceedings, and documents from the state court proceeding.

4. The United States District Court for the Western District of Washington has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has made claims against the Defendants alleging violations of the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692, *et seq.*

5. Removal is proper if an action includes a claim "arising under the Constitution, laws, or treaties of the United States." 28 U.S.C. § 1331.

6. The FDCPA allows claims under that statute to "be brought in any appropriate United States district court without regard to the amount in controversy." 15 U.S.C. § 1692k(d).

7. The United States District Court for the Western District of Washington has supplemental jurisdiction over the state law claims asserted by Plaintiff because those claims form part of the same case or controversy as Plaintiff's FDCPA claims. *See* 28 U.S.C. § 1367(a).

DATED: June 19, 2025

Respectfully submitted,

BARRON & NEWBURGER, P.C.

By: /s/ Brit J. Suttell

Brit J. Suttell, Esquire

WSBA #60371

6100 219th St. SW

Suite 480

Mountlake Terrace, WA 98043

(484) 999-4232

britjsuttell@bn-lawyers.com

Counsel for Defendant

CERTIFICATE OF SERVICE PURSUANT TO LCR 101(b)(2)

This case has not been filed in King County Superior Court. However, below is contact information for the following:

Plaintiffs Brenda and Dave Dinger
Tyler Santiago
Anderson Santiago
207B Sunset Blvd. N.
Renton, WA 98057
tyler@alkc.net

I certify that a true and correct copy of the Notice of Removal was provided to all counsel via electronic means.

DATED: June 19, 2025

Respectfully submitted,

BARRON & NEWBURGER, P.C.

By: /s/ Brit J. Suttell
Brit J. Suttell, Esquire
WSBA #60371
6100 219th St. SW
Suite 480
Mountlake Terrace, WA 98043
(484) 999-4232
britjsuttell@bn-lawyers.com
Counsel for Defendant